

REMARKS

Claims 1-33 are pending in the present application.

Claims 1-33 were rejected.

Claim 25 has been amended as shown above.

Claims 1-33 remain in the application.

The Applicants request reconsideration of Claims 1-33 in view of the following arguments.

In Section 1 of the May 19, 2004, Office Action, the Examiner objected to Claim 25 under 37 C.F.R. § 1.75(c) as being of improper dependent form for failing to further limit the subject matter of a previous claim. The Applicant has amended Claim 25 to correct the antecedent basis problem noted by the Examiner. This being the case, the Applicant respectfully requests withdrawal of the § 1.75 rejection.

In Sections 2 and 3 of the May 19, 2004, Office Action, the Examiner rejects Claims 1-33 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,091,953 to *Ho et al* (hereafter, simply "*Ho*").

The Applicant respectfully disagrees with the rejection of Claims 1-33 and directs the Examiner's attention to Claim 1, which contains the unique and non-obvious limitations emphasized below:

1. (Original) For use in a mobile telecommunications network comprising a mobile switching center, a plurality of subscribers, and a processing element unit, wherein said mobile switching center is capable of communicating with said plurality of subscribers and with said processing element unit, an apparatus for providing a distributed processing element unit capable of accessing

each processing element within said processing element unit, said apparatus comprising:

a processing element unit controller within said mobile switching center, said processing element unit controller capable of embedding information within a temporary identification number of a subscriber, wherein said information locates a processing element within said processing element unit. (*Emphasis added*)

Independent Claim 12 recites analogous limitations. The Applicant respectfully asserts that the above-emphasized limitations of Claims 1 and 12 are not disclosed, suggested, or even hinted at in the *Ho* reference.

In rejecting independent Claim 1, the Examiner relied upon the text at column 10, lines 27-48, of the *Ho* reference, which states:

The switch processing core 404 performs the overhead operations necessary in assigning mobile units to MSCs and in routing calls and messages between the mobile units and the assigned MSCs. The addressing table 406 is used by the dispatching switch 400 to establish and maintain the assignments. After initial assignment, the dispatching switch 400 accesses the addressing table 406 to determine how to properly route communications and messages between the BSCs and the MSCs. Based upon the access, the switch processing core 404 operates the switch fabric 402 to route traffic.

The construction of a message router is similar to that of the dispatching switch 400. However, in a message router, there is no switch processing core or addressing table. But, a simple processing unit is required in the message router to inspect each signaling message from the BSS, extract the temporary ID of the mobile unit from the message header, and forward the message to the serving MSC. This processing unit also selects the serving MSC for mobile units that enter the network from a foreign network or mobile units that do not use the temporary ID to identify themselves in signaling messages and other communications. (*Emphasis added*)

The Applicants respectfully assert that neither the above-cited portions nor any other portion of the *Ho* reference discloses the unique and non-obvious limitations recited in Claims 1 and 12. The *Ho*

reference, as the emphasized passage illustrates, teaches a dispatching switch 400 for assigning mobile stations to distributed mobile switching centers (MSCs) and for routing subsequent messages from a mobile station to the assigned MSC. The *Ho* reference does not disclose, suggest or even hint at a processing element unit controller within a MSC capable of embedding information in a subscriber temporary identification number to locate one of a plurality of processing elements within a distributed processing unit, as recited in Claims 1 and 12.

Independent Claim 23 contains the unique and non-obvious limitations emphasized below:

23. (Original) For use in a mobile telecommunications network comprising a mobile switching center, a plurality of subscribers, and a visitor location register, wherein said mobile switching center is capable of communicating with said plurality of subscribers and with said visitor location register, an apparatus for providing a distributed visitor location register capable of accessing each visitor location register site within said visitor location register, said apparatus comprising:

a visitor location register controller within said mobile switching center, said visitor location register controller capable of embedding information within a temporary identification number of a subscriber, wherein said information locates a visitor location register site within said visitor location register. (*Emphasis added*)

The Applicant respectfully asserts that the above-emphasized limitations of Claims 1 and 12 are not disclosed, suggested, or even hinted at in the *Ho* reference.

In rejecting Claim 23, the examiner relied upon the text at column 8, lines 37-57, and column 9, line 57, through column 10, line 4, which state:

In an example of operation of the system, a mobile unit first attaches to one of the base stations of the BSS 210 or, alternatively, sends a location update request to the BSS 210. The dispatching switch 102 receives the attach request (or location update request) from the mobile unit and, based upon information regarding the MSCs 104-108, assigns the mobile unit to MSC 108, the serving MSC. MSC 108

then accesses the HLR 212 which causes the HLR 212 to be updated and subsequently updates its VLR 208 with the accessed information. When the dispatching switch 102 makes the assignment, the dispatching switch 102 updates the addressing table 202 with the identity of the mobile unit and the identity of the serving MSC 108 to which the mobile unit was assigned.

* * *

The system 300 may also include a dispatching switch 320 that performs the overhead required to setup and route traffic/messages between the BSCs 308-314 and the MSCs 302-306. When provided, the dispatching switch 320 includes an addressing table which assigns and maintains routing information used in setting up and routing the traffic/messages. In a fashion similar to that described with reference to the dispatching switch 102 of FIG. 1, when a mobile unit requests service within the system 300, the dispatching switch 320 assigns the mobile unit to one of the MSCs 302-306 based upon loading of the MSCs 302-306. A VLR of the assigned MSC and the HLR are then updated to indicate that the mobile unit is served by the MSC. Subsequently, the MSC services all traffic/messages for the mobile unit.
(*Emphasis added*)

The Applicants respectfully assert that neither the above-cited portions nor any other portion of the *Ho* reference discloses the unique and non-obvious limitations recited in Claim 23. The *Ho* reference teaches in these passages, as in the earlier cited passage, the assigning of mobile stations to distributed MSCs. Each MSC maintains a visitor location register (VLR) for the mobile stations assigned to that MSC. The *Ho* reference does not teach, suggest or even hint at a VLR controller within the MSC capable of embedding information in a temporary identification number for locating a VLR site within a distributed VLR, as recited in Claim 23.

In sum, independent Claims 1, 12 and 23 contains patentable subject matter over the *Ho* reference. Also, dependent Claims 2-11, 13-22 and 24-33 which depend from Claims 1, 12 and 23,

respectively, contain all of the unique and non-obvious limitations recited in their base claims. Thus, Claims 2-11, 13-22 and 24-33 also are patentable over the *Ho* reference.

SUMMARY

For the reasons given above, the Applicant respectfully requests reconsideration and allowance of pending claims and that this Application be passed to issue. If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this Application, the Applicant respectfully invites the Examiner to contact the undersigned at the telephone number indicated below or at *jmockler@davismunck.com*.

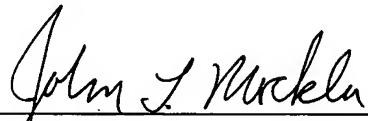
The Commissioner is hereby authorized to charge any additional fees connected with this communication or credit any overpayment to Deposit Account No. 50-0208.

Respectfully submitted,

DAVIS MUNCK, P.C.

Date: 9 August 2004

P.O. Drawer 800889
Dallas, Texas 75380
Phone: (972) 628-3600
Fax: (972) 628-3616
E-mail: *jmockler@davismunck.com*



John F. Mockler
Registration No. 39,775